

**SANTAMARIA AFFIDAVIT  
EXHIBIT L  
PLAINTIFF'S DEPOSITION  
PP 80-82**

1 JANKOUSKY 80

2 exactly what it was. And I had spoken,  
3 actually, even to a man at the New York  
4 lottery before I paid it.

5 Q You paid it on the promise to be  
6 repaid and then it wasn't going to be paid?

7 A Yes.

8 Q Do you remember any other  
9 difficulty, whether it's chronological or not,  
10 that you had with Paul Santamaria?

11 A Well, there was a loss that we took  
12 from a new client, one of the bankers for a  
13 couple of thousand dollars.

14 Q What was the name of that  
15 particular customer, if you recall?

16 A Charles Bryant.

17 Q And you said this was a new  
18 customer?

19 A Yes.

20 Q And the branch took a loss?

21 A Yes.

22 Q What happened with Mr. Santamaria?

23 A He questioned whether we were

24 overseeing, he questioned why we took a loss  
25 and what we were doing about it.

1

JANKOUSKY

81

2

Q Under the circumstances, was that a  
reasonable question?

4

MS. GOODELL: Objection to the form  
of the question.

6

A Yes.

7

Q What did you tell him?

8

A I told him that one of our tellers  
hadn't put the new account hold on the deposit  
and that when returns of deposits were coming  
in -- returns of deposit were given  
notification to Fifth Avenue branch, that was  
how we discovered it.

14 But the banker hadn't called the  
15 place of employment and hadn't verified the  
16 phone number because the client had given a  
17 false phone number and false place of  
18 employment. And we would not have opened the  
19 account.

20 Q Did you explain all this to  
21 Mr. Santamaria?

22 A Yes, I did. And I held a meeting  
23 with the staff and gave the staff a memo which  
24 each person had to initial that they  
25 understood what was required of them, as a

1 JANKOUSKY 82

2 teller in processing new account deposits, and  
3 as a banker in opening new accounts.

4 Q Any other difficulties with Paul  
5 Santamaria?

6           A        There was an issue of a new teller  
7    who showed a loss of a thousand dollars which  
8    we could never find.

9 Q What did Paul Santamaria have to  
10 say about that loss which couldn't be found?

11 A He told us that we should have had  
12 designated an employee who's sole job was just  
13 to stand by that teller for several days  
14 watching him perform his job, for full  
15 supervision.

16 Q Had the teller been through teller  
17 training?

18 A Yes.

19 Q How had the teller performed during  
20 teller training?

21 A Very well.

22 Q No problems?

23 A No.

24 Q And before the loss, when the new  
25 teller was put on the line, were there any